

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JOHN AND JANE DOE NO. 1, et al.,	:	CASE NO. 3:22-cv-00337
	:	
	:	
Plaintiffs,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL DISTRICT BOARD OF EDUCATION, et al.,	:	
	:	
Defendants.	:	

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
REPLY TO DEFENDANTS' RESPONSE TO PLAINTIFFS' AMENDED
MOTION FOR SANCTIONS REGARDING DEFENDANTS' ATTORNEYS
LYNNETTE DINKLER AND JOHN A. PODGURSKI.**

Plaintiffs John and Jane Doe No. 1; Child No. 1A, a minor, by and through her legal guardians John and Jane Doe No. 1; John and Jane Doe No. 2; John Doe No. 3; Child No. 3B, a minor, by and through her legal guardian John Doe No. 3; Child No. 3C, a minor, by and through his legal guardian John Doe No. 3; Jane Doe No. 4; Child No. 4D, a minor, by and through his legal guardian Jane Doe No. 4; Jane Doe No. 5; Child No. 5E, a minor, by and through his legal guardian Jane Doe No. 5; Jane Doe No. 6; Jane Doe No. 7; Child No. 7F, a minor, by and through his legal guardian Jane Doe No. 7; John and Jane Doe No. 8; and John Doe No. 9 ("Plaintiffs") respectfully move for a seven (7) day extension to reply to Defendants' Response to Plaintiffs'

Amended Motion for Sanctions Regarding Defendants' Attorneys Lynnette Dinkler and John A. Podgurski ("Defendants' Response"), Doc. 86.

Plaintiffs' Amended Motion for Sanctions Regarding Defendants' Attorneys Lynnette Dinkler and John A. Podgurski ("Plaintiffs' Motion for Sanctions"), Doc. 74 was filed on March 24, 2023. Defendants' Response was due April 14, 2023. S.D. Ohio Civ. R. 7.2(a)(2). Bethel Local School District Board of Education, Lydda Mansfield, Lori Sebastian, Natalie Donahue, Danny Elam, Jacob King, and Superintendent Matthew Chrispin ("Defendants") received a fourteen (14) day extension to file Defendants' Response, Doc. 80, and therefore filed Defendants' Response on April 28, 2023, Doc. 86. Plaintiffs' Reply to Defendants' Response ("Plaintiffs' Reply") is due May 12, 2023. S.D. Ohio Civ. R. 7.2(a)(2). In order to fully brief the issues presented, Plaintiffs respectively request a seven (7) day extension for filing Plaintiffs' Reply with a new deadline of May 19, 2023.

Plaintiffs discussed this matter with counsel for Defendants and the Motion is unopposed. In addition, the request for an extension of time is not made for the purpose of delay, is proportional to the extension of time granted to the Defendants, and will not prejudice any party.

Dated: May 11, 2023

Respectfully submitted,

s/ Julie E. Byrne
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May, 2023, I served a copy of the foregoing via the Court's ECF system, which notifies all counsel of record.

s/ Julie E. Byrne
Julie E. Byrne